

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

SYLVIA WINGARD as the Administrator)
of the Estate of GEORGE WINGARD,)

Plaintiff,)

v.)

PFIZER INC., a Delaware)
Corporation; PHARMACIA)
CORPORATION, a Delaware Corporation;)
MONSANTO, COMPANY, a Delaware)
Corporation; G.D. SEARLE, LLC.,)
a Delaware Corporation; ALEX)
DUMOULIN, JR and fictitious Defendants)
A, B, C and D being those persons, firms)
or corporations whose actions, inactions,)
fraudulent suppression, fraud, scheme)
to defraud and/or other wrongful conduct)
caused or contributed to the Plaintiff's)
injuries and damages, and whose true)
names and identities are presently unknown)
to the Plaintiff but will be substituted by)
amendment when ascertained,)

Defendants.)

CIVIL ACTION NO:

AFFIDAVIT OF ALEX DUMOULIN

STATE OF ALABAMA)

COUNTY OF Montgomery)

I, Alex Dumoulin, under penalty of perjury, and duly competent to testify on the matters
herein, state as follows:

1. I am currently employed as a therapeutic specialty representative for Pfizer Inc. I have been employed by Pfizer since May 2001. This affidavit is based upon my personal knowledge.

2. As a therapeutic specialty representative, I visit physicians and healthcare providers' offices and provide them FDA-approved package inserts and other FDA-approved information about Pfizer's products, which is referred to as "detailing."

3. In September 2005, I began working as a therapeutic specialty representative for Pfizer in the State of Alabama. Prior to September 2005, I was employed by Pfizer and resided in the State of South Carolina.

4. I have never detailed the prescription medication Bextra® to any physician or healthcare provider in the State of Alabama. I have likewise never marketed or distributed Bextra® to any Alabama healthcare providers or patients.

5. I am not a physician or pharmacist. I have no specialized medical or pharmacological education. Pfizer provides me with the FDA-approved package inserts and other FDA-approved information for the medications I detail.

6. At no time did I have any involvement with the design, manufacture, development or testing of the prescription medication Bextra®, nor did I have any involvement in the FDA-approved package insert for Bextra®.

7. At no time did I ever sell, offer to sell, or take orders for the sale of Bextra® to health care providers, physicians or patients.


8. I have never met nor spoken with George Wingard or Sylvia Wingard. At no time did I ever provide Bextra® or information concerning Bextra® directly to George Wingard or Sylvia Wingard.

9. I have never made any presentations to the general public concerning Bextra®.



ALEX DUMOULIN

Before me, the undersigned Notary Public, came Alex Dumoulin, who is known to me, and who first being duly sworn, deposed and stated that the averments of this affidavit are true and correct, and who executed this affidavit in my person and present with his hand and seal, on this the 16 day of MARCH, 2006.


Notary Public
My Commission Expires: 3/18/07